

**Indiana Office of Utility Consumer Counselor's**  
**July 2, 2021**  
**Response to the Indiana Utility Regulatory Commission's**  
**Request for Input of the IURC's 2021 Draft Issues List for Improving**  
**Procedural Efficiencies ("IPE")**

On May 14, 2021, the Indiana Utility Regulatory Commission ("Commission") invited input on the list of proposed issues identified by Commission Staff for the continuation of the Improving Procedural Efficiencies ("IPE") initiative. The Commission identified two areas for input and comments: (1) updates to the minimum standard filing requirements rule and (2) demand side management ("DSM") and energy efficiency ("EE") proceedings. In addition to requesting feedback and input with respect to these two areas, the Commission invited parties to identify other issues they believe should be considered.

The Commission identified more specific items within those areas, which the OUCC repeats below:

**I. Minimum Standard Filing Requirements Rule Amendment**

A. *Applicability – MSFR will not apply to small utility cases; should it apply to all other rate cases or only those filed under IC 8-1-2-47.2 and/or under the 300 day time constraint?*

B. *Test years – the rule amendment will be drafted to have separate sections for each type of test year (historic, forward looking, hybrid) with the listing of required workpapers for each type – what should be included?*

C. *Workpapers – what should be required and what can be eliminated?*

***NOTE: The current MSFR will expire on January 1, 2022. Because the rulemaking amending the rule will not be completed by that date, the IURC will be readopting the existing rule.***

**OUCC's Comment:** The OUCC continues to support the Commission's initiative to update the MSFR. As part of this process, the OUCC encourages the Commission to ensure all key terms are well-defined.

**II. Demand Side Management ("DSM") – Energy Efficiency ("EE") Proceedings:**

A. *Establish a consistent filing deadline – proposed is no later than July 15<sup>th</sup> of the year prior to when the proposed DSM/EE programs are to be in effect.*

B. *Workpapers should be provided in Excel as IURC staff and other parties need to be able to see and verify the formulas and calculations. Read-only and pdfs may be filed, as long as an Excel version is also provided.*

C. *Establish a consistent filing time for evaluation, measurement, and verification (“EM&V”) reports – proposed is April 30<sup>th</sup>.*

D. *New compliance filing dates.*

E. *Utility should provide the following items as part of its filing:*

- 1) *Provide ex ante gross estimates of kW and kWh impact estimates at DSM program level.*
- 2) *Provide ex post net estimates of kW and kWh impact estimates at DSM program level.*
- 3) *Provide avoided cost data by year, including:*
  - a. *Avoided energy cost;*
  - b. *Assumed carbon tax costs included and supporting assumptions concerning amounts and timing;*
  - c. *Avoided generating capacity costs and basis;*
  - d. *Avoided transmission and distribution cost and basis.*
- 4) *Provide measure data, including:*
  - a. *kW savings estimate and coincident peak factors;*
  - b. *kWh savings estimate;*
  - c. *Net-to-gross factor;*
  - d. *Baseline assumptions and source reference;*
  - e. *Expected useful life and source reference;*
  - f. *Cost of measure compared to baseline;*
  - g. *Customer incentive provided.*
- 5) *Provide the discount rates used in modeling.*

F. *Develop definitions for cost effectiveness tests.*

**OUC’s Comment:** The OUC supports the Commission’s initiative to incorporate these DSM and EE changes and expects these changes could reduce the amount of discovery in DSM and EE proceedings. As with the MSFR, the OUC supports developing definitions wherever practicable.

### **III. Additional Issues:**

*Please submit any additional issues you would like considered for inclusion in the 2021 IPE initiative.*

**OUC’s Comment:** The OUC encourages the Commission to incorporate the General Administrative Order (“GAO”) 2020-05 into any rules the Commission intends to amend as practicable.

The OUC also suggests the Commission’s customer deposit rules be reviewed and the rules be amended for appropriate updates or changes.<sup>2</sup>

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<sup>2</sup> Commission Customer Deposit Rules have been promulgated for each type of utility – electric (170 IAC 4-1-15), gas (170 IAC 5-1-15), water (170 IAC 6-1-15), and wastewater (170 IAC 8.5-2-3).